

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11 (Subchapter V)
)	
FREE SPEECH SYSTEMS LLC,)	Case No. 22-60043 (CML)
)	
Debtor.)	
)	

**THE CONNECTICUT PLAINTIFFS' AND THE TEXAS PLAINTIFFS'
WITNESS AND EXHIBIT LIST**

Judge	Hon. Christopher M. Lopez
Hearing Date	Monday, March 27, 2023
Hearing Time	1:00 p.m. (CST)
Party's Name	Sandy Hook Families (as defined below)
Attorney's Names	Kyle J. Kimpler (Connecticut Plaintiffs) Avi Moshenberg, Jarrod B. Martin, Jennifer J. Hardy (Texas Plaintiffs)
Attorney's Phone	212-373-3253 (Kyle J. Kimpler) 713-337-5580 (Avi Moshenberg) 713-356-1280 (Jarrod B. Martin) 713-510-1766 (Jennifer J. Hardy)
Nature of Proceeding	Joint Motion to Revoke Subchapter V Election [Dkt. 468]

The Connecticut Plaintiffs¹ and the Texas Plaintiffs² (together, the “Sandy Hook Families”) hereby submit this Witness and Exhibit List in connection with the hearing on the *Joint Motion to Revoke the Debtor's Subchapter V Election* [Dkt. 468] in the above-captioned chapter 11 case to

¹ The “Connecticut Plaintiffs” are Mark Barden, Jacqueline Barden, Francine Wheeler, David Wheeler, Ian Hockley, Nicole Hockley, Jennifer Hensel, William Aldenberg, William Sherlach, Carlos M. Soto, Donna Soto, Jillian Soto-Marino, Carlee Soto Parisi, and Robert Parker.

² The “Texas Plaintiffs” are Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine. For purposes of this Motion, Marcel Fontaine is one of the “Sandy Hook Families” for ease of identification, but his claims against the Debtor are distinct and not “Sandy Hook” related.

be held on March 27, 2023, at 1:00 P.M. (Central Standard Time) and that may be adjourned or continued from time to time by the Court (the “Hearing”):

WITNESSES

The Sandy Hook Families may call the following witnesses at the Hearing:

1. Any witness listed or called by any other party; and
2. Rebuttal witnesses as necessary.

The Sandy Hook Families do not presently intend to offer testimony from any witness but reserve the right to do so. The Sandy Hook Families reserve the right to cross-examine any witness identified by any other party and to call any other party’s witness as a rebuttal witness.

EXHIBITS

The Sandy Hook Families may offer into evidence one or more the following exhibits at the Hearing:

No.	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
	Any document or pleading filed in the above-captioned case				
	Any exhibit necessary for impeachment and/or rebuttal purposes				
	Any exhibit identified or offered by any other party				

RESERVATION OF RIGHTS

The Sandy Hook Families reserve all rights, including, but not limited to, the right to amend, revise, or supplement this witness and exhibit list at any time, to designate additional witnesses and exhibits, to call any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, and to offer

additional witnesses and exhibits at the Hearing for purposes of impeachment, rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure and the Federal Rules of Evidence.

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Dated: March 23, 2023

MCDOWELL HETHERINGTON LLP

By: /s/ Avi Moshenberg
Avi Moshenberg
State Bar No. 24083532
1001 Fannin Street, Suite 2700
Houston, TX 77002
Telephone: (713) 337-5580
Fax: (713) 337-8850
E-mail: Avi.Moshenberg@mhlhp.com

**CHAMBERLAIN, HRDLICKA,
WHITE, WILLIAMS & AUGHTRY, PC**

By: /s/ Jarrod B. Martin
Jarrod B. Martin
State Bar No. 24070221
1200 Smith Street, Suite 1400
Houston, TX 77002
Telephone: (713) 356-1280
Fax: (713) 658-2553
E-mail: jarrod.martin@chamberlainlaw.com

WILLKIE FARR & GALLAGHER LLP

By: /s/ Jennifer J. Hardy
Jennifer J. Hardy
State Bar No. 24096068
600 Travis Street
Houston, TX 77002
Telephone: (713) 510-1766
Fax: (713) 510-1799
E-mail: jhardy2@willkie.com

WILLKIE FARR & GALLAGHER LLP

Rachel C. Strickland (admitted *pro hac vice*)
Stuart R. Lombardi (admitted *pro hac vice*)
Ciara A. Sisco (admitted *pro hac vice*)
787 Seventh Avenue
New York, NY 10019
Telephone: (212) 728-8000
Fax: (212) 728-8111
E-mail: rstrickland@willkie.com
E-mail: slombardi@willkie.com
E-mail: csisco@willkie.com

Co-Counsel to the Texas Plaintiffs

Respectfully submitted,

CAIN & SKARNULIS PLLC

By: /s/ Ryan E. Chapple
Ryan E. Chapple
State Bar No. 24036354
303 Colorado Street, Suite 2850
Austin, TX 78701
Telephone: (512) 477-5000
Fax: (512) 477-5011
E-mail: rchapple@cstrial.com

KOSKOFF KOSKOFF & BIEDER, PC

Alinor C. Sterling (admitted *pro hac vice*)
350 Fairfield Avenue
Bridgeport, CT 06604
Telephone: (203) 336-4421
E-mail: asterling@koskoff.com

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

Kyle J. Kimpler (admitted *pro hac vice*)
Christopher Hopkins (admitted *pro hac vice*)
Martin J. Salvucci (admitted *pro hac vice*)
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Fax: (212) 757-3990
E-mail: kkimpler@paulweiss.com
E-mail: chopkins@paulweiss.com
E-mail: msalvucci@paulweiss.com

Co-Counsel to the Connecticut Plaintiffs

CERTIFICATE OF SERVICE

I certify that on March 23, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Ryan E. Chapple

Ryan E. Chapple